

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

<b>CHARLES A. WAKEFIELD,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. CIV-17-1006-R</b>
	)	
<b>SODEXO USA,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF'S FINAL WITNESS LIST**

Plaintiff, Charles A. Wakefield through his attorney of record, Melvin C. Hall of Riggs, Abney, Neal, Turpen, Orbison & Lewis, pursuant to this Court's January 4, 2018, Order [DKT #11] files Plaintiff's Final Witness List.

1. Charles Wakefield  
c/o Melvin C. Hall, OBA No. 3728  
RIGGS, ABNEY, NEAL, TURPEN,  
ORBISON & LEWIS  
528 NW 12th Street  
Oklahoma City, OK 73103

Will testify to subjects of his employment; his salary, as compared to William Humphrey and others; his job performance; the discipline he received as well as the discipline received by others; and his protected activity of complaints of discrimination, retaliation, and termination.

2. Lisa Failing  
c/o Jeremy Tubb, OBA No. 16739  
Tiffany J. Wythe, OBA No. 21405  
FULLERUBB & BICKFORD, PLLC  
201 Robert S. Kerr Ave., Suite 1000  
Oklahoma City, Oklahoma 73102-4216

Will testify as to any specific knowledge of Plaintiff's employment; Plaintiff's salary, as compared to William Humphrey and others; Plaintiff's job performance; the discipline

Plaintiff received as well as the discipline received by others; and Plaintiff's protected activity of complaints of discrimination, retaliation, and termination.

3. Kevin Benda  
c/o Jeremy Tubb, OBA No. 16739  
Tiffany J. Wythe, OBA No. 21405  
FULLERUBB & BICKFORD, PLLC  
201 Robert S. Kerr Ave., Suite 1000  
Oklahoma City, Oklahoma 73102-4216

Will testify as to any specific knowledge of Plaintiff's employment; Plaintiff's salary, as compared to William Humphrey and others; Plaintiff's job performance; the discipline Plaintiff received as well as the discipline received by others; and Plaintiff's protected activity of complaints of discrimination, retaliation, and termination.

4. Joseph Heeb  
c/o Jeremy Tubb, OBA No. 16739  
Tiffany J. Wythe, OBA No. 21405  
FULLERUBB & BICKFORD, PLLC  
201 Robert S. Kerr Ave., Suite 1000  
Oklahoma City, Oklahoma 73102-4216

Will testify as to any specific knowledge of Plaintiff's employment; Plaintiff's salary, as compared to William Humphrey and others; Plaintiff's job performance; the discipline Plaintiff received as well as the discipline received by others; and Plaintiff's protected activity of complaints of discrimination, retaliation, and termination.

5. William Humphrey  
c/o Jeremy Tubb, OBA No. 16739  
Tiffany J. Wythe, OBA No. 21405  
FULLERUBB & BICKFORD, PLLC  
201 Robert S. Kerr Ave., Suite 1000  
Oklahoma City, Oklahoma 73102-4216

Will testify as to any specific knowledge of Plaintiff's employment; Plaintiff's salary, as compared to William Humphrey and others; Plaintiff's job performance; his salary compared to Plaintiffs; and the discipline Plaintiff received as well as the discipline received by others.

6. Raymond McMillion  
c/o Melvin C. Hall, OBA No. 3728  
RIGGS, ABNEY, NEAL, TURPEN,  
ORBISON & LEWIS  
528 NW 12th Street  
Oklahoma City, OK 73103

Will testify as to any specific knowledge of Plaintiff's employment; Plaintiff's salary, as compared to his salary and others; Plaintiff's job performance; and the discipline Plaintiff received as well as the discipline received by others.

7. Chuck Thomas  
c/o Jeremy Tubb, OBA No. 16739  
Tiffany J. Wythe, OBA No. 21405  
FULLERUBB & BICKFORD, PLLC  
201 Robert S. Kerr Ave., Suite 1000  
Oklahoma City, Oklahoma 73102-4216

Will testify as to any specific knowledge of Plaintiff's employment; Plaintiff's salary, as compared to William Humphrey and others; Plaintiff's job performance; the discipline Plaintiff received as well as the discipline received by others; and Plaintiff's protected activity of complaints of discrimination, retaliation, and termination.

8. Lorna Donatone  
c/o Jeremy Tubb, OBA No. 16739  
Tiffany J. Wythe, OBA No. 21405  
FULLERUBB & BICKFORD, PLLC  
201 Robert S. Kerr Ave., Suite 1000  
Oklahoma City, Oklahoma 73102-4216

Will testify as to any specific knowledge of Plaintiff's employment; Plaintiff's salary, as compared to William Humphrey and others; and the wage freeze directive that was attributed to her.

9. John Petro  
ADDRESS UNKNOWN

Will testify as to any specific knowledge of his employment; his salary; his job performance; and the discipline he received as well as his termination.

10. James Mike Majors  
ADDRESS UNKNOWN

Will testify as to any specific knowledge of Plaintiff's employment and Plaintiff's job performance.

11. John Milne  
ADDRESS UNKNOWN

Will testify as to any specific knowledge of Plaintiff's employment and Plaintiff's job performance.

12. Patricia O'Hara  
c/o Jeremy Tubb, OBA No. 16739  
Tiffany J. Wythe, OBA No. 21405  
FULLERUBB & BICKFORD, PLLC  
201 Robert S. Kerr Ave., Suite 1000  
Oklahoma City, Oklahoma 73102-4216

Will testify as to any specific knowledge of Plaintiff's employment; Plaintiff's salary, as compared to William Humphrey and others; Plaintiff's job performance; the discipline Plaintiff received as well as the discipline received by others; and Plaintiff's protected activity of complaints of discrimination, retaliation, and termination.

13. Chris Crelia  
c/o Norman Public Schools  
131 South Flood  
Norman, OK 73069

Will testify as to any specific knowledge of Plaintiff's employment, including but not limited to knowledge of Plaintiff's job performance as Manager Environmental Service (ES) Custodial II.

14. Olivia Dean  
c/o Norman Public Schools  
131 South Flood  
Norman, OK 73069

Will testify as to any specific knowledge of Plaintiff's employment, including but not limited to knowledge of Plaintiff's job performance as Manager Environmental Service (ES) Custodial II.

15. Carol Buron  
c/o Norman Public Schools  
131 South Flood  
Norman, OK 73069

Will testify as to any specific knowledge of Plaintiff's employment, including but not limited to knowledge of Plaintiff's job performance as Manager Environmental Service (ES) Custodial II.

- 16 Linda Parsons  
c/o Norman Public Schools  
131 South Flood  
Norman, OK 73069

Will testify as to any specific knowledge of Plaintiff's employment, including but not limited to knowledge of Plaintiff's job performance as Manager Environmental Service (ES) Custodial II.

17. Susan Powell  
c/o Norman Public Schools  
131 South Flood  
Norman, OK 73069

Will testify as to any specific knowledge of Plaintiff's employment, including but not limited to knowledge of Plaintiff's job performance as Manager Environmental Service (ES) Custodial II.

18. Paula Palermo  
c/o Norman Public Schools  
131 South Flood  
Norman, OK 73069

Will testify as to any specific knowledge of Plaintiff's employment, including but not limited to knowledge of Plaintiff's job performance as Manager Environmental Service (ES) Custodial II.

19. Kevin Hogan  
c/o Norman Public Schools  
131 South Flood  
Norman, OK 73069

Will testify as to any specific knowledge of Plaintiff's employment, including but not limited to knowledge of Plaintiff's job performance as Manager Environmental Service (ES) Custodial II.

20. Kelly Otis  
c/o Norman Public Schools  
131 South Flood  
Norman, OK 73069

Will testify as to any specific knowledge of Plaintiff's employment, including but not limited to knowledge of Plaintiff's job performance as Manager Environmental Service (ES) Custodial II.

21. All witnesses listed by Defendant, unless otherwise objected to.
22. Discovery is ongoing. Plaintiff reserves the right to supplement this list.

Respectfully submitted,

s/ Melvin C. Hall  
Melvin C. Hall, OBA No. 3728  
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ORBISON & LEWIS  
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Oklahoma City, OK 73103  
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Email: [mhall@riggsabney.com](mailto:mhall@riggsabney.com)

**CERTIFICATE OF SERVICE**

I certify that on July 2, 2018, the forgoing pleading was electronically filed with the Clerk of the Court and was served using the ECF System to all counsel of record via the ECF System including to:

Jeremy Tubb, OBA No. 16739  
Tiffany J. Wythe, OBA No. 21405  
FULLERUBB & BICKFORD, PLLC  
201 Robert S. Kerr Ave., Suite 1000  
Oklahoma City, Oklahoma 73102-4216  
Telephone: (405) 235-2575  
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Email: [jeremy.tubb@fullertubb.com](mailto:jeremy.tubb@fullertubb.com)  
[tiffany.wythe@fullertubb.com](mailto:tiffany.wythe@fullertubb.com)

*s/ Melvin C. Hall*